



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105-3901

Certified Mail

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May 4, 2016

David Campbell
Environmental Manager
San Joaquin Refining Company, Inc.
3542 Shell Street
Bakersfield, CA 93308

Subject: Underground Injection Well WD-1 and Request for Meeting to Discuss injection at the San Joaquin Refining Company, Inc. Site, Bakersfield, California.

Dear Mr. Campbell:

Thank you for your submittal of information pertaining to injection well WD-1 that the San Joaquin Refining Company uses to inject process waste generated from refinery units at the plant, located at 3542 Shell Street, Bakersfield, California (the "Facility"). According to information you provided, this well was installed in 1995 and has been operating under the original Waste Discharge Requirements (WDR) permit issued by the Central Valley Regional Water Quality Control Board as Order No. 91-132. In addition, your submittal notes that injection is occurring at depths between 4,020' to 4,255' below ground surface into the Santa Margarita Formation, within the Fruitvale oil field.

Based on the information provided in your recent submittal, EPA Region 9 has determined that San Joaquin Refinery's injection of industrial fluids must be properly permitted through the EPA Class I Non-Hazardous Underground Injection Control (UIC) Regulations. Additionally, the Santa Margarita formation currently receiving the Facility's injection fluids may be protected as an underground source of drinking water (USDW) under the Safe Drinking Water Act. The UIC Regulations require that Class I industrial fluids are injected below the lowermost USDW.

Given these circumstances, I request a meeting within the next two weeks to discuss options for the Facility's injection wells. Please call David Albright, Manager of the Drinking Water Protection Section, at (415) 972-3971 to arrange a date and time of mutual convenience.

Thank you for your prompt attention and I look forward to meeting with you soon to discuss these matters.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Montgomery".

Michael Montgomery
Assistant Director, Water Division

cc: Ken Harris, State Oil and Gas Supervisor, CA DOGGR
Jonathan Bishop, Chief Deputy, CA SWRCB
Clay Rodgers, Assistant Executive Officer, Central Valley RWQCB

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